

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-11831
Rules Governing the Amateur Radio Service)	
Rules to Reduce Interference and)	
Add Transparency to)	
Digital Data Communications)	

To: The Chief, Wireless Telecommunications Bureau

Via: ECFS Electronic Filing

April 8, 2019

COMMENTS OF GEORGE HULING, K5GH

Thank you for allowing me to voice **STRONG SUPPORT** for this proposed rulemaking request, **RM-11831**, filed by Mr. Ron Kolarik, K0IDT. The proposed RM-11831 (Kolarik petition FCC ID 100918881206) solves many long-standing problems with the now suspended NPRM 16-239, RM-11708, and associated RM-11759 and the previously withdrawn RM-11306. The ARRL/ARSFI driven "wideband digital" issue has been petitioned, opposed, withdrawn, petitioned again in various form, opposed again, suspended, and dragged on since before 2007. The issue at every turn has met widespread objection from the amateur radio community at large. There is no point in a detailed review of those well founded and numerous objections. Mr. Kolarik's proposal, RM-11831, addresses both interference and encryption concerns that stem from the proliferation of wideband digital modes on HF.

By background, as an Amateur Extra Class license holder, first licensed in 1955 as WN5KHP upgraded to W5KHP same year. As an ex USNR-RM3 USS FORRESTAL CVA-59 (62-64) I really appreciate and understand the agency for setting on RM-11708.

My interests in amateur radio are very diverse and widespread, not those of a “special interest group” such as those that have pushed for RM-11708 and NPRM 16-239, as a way to provide free encrypted email and bypass commercial maritime services under the guise of “emergency communications” while exhibiting total disregard for incumbent spectrum users.

Furthermore, I am a Life Member of the ARRL. I am a authorized card checker for the ARRL / IARU for the following awards, DXCC, WAS, VUCC and WAC. I applaud the FCC, ARRL and Congress who are looking to safeguard our country and the future of amateur radio by taking a close look at this long-standing, improper use of amateur radio. The hobby of amateur radio was created as a hobby which fosters technical growth, innovation and international good will through conversation over the airwaves, and expressly forbids the use of the hobby and its spectrum for obscured messages, pecuniary interest, or the bypassing of other commercial email services. RM-11831 addresses ongoing violations and bolsters amateur radio.

PLEASE EXPEDITE ADOPTION OF RM-11831

- Finally, with RM-11831, a thoughtful proposal has been made that addresses serious issues associated with the problematic proposed expansion and proliferation of wideband encrypted digital modes and their associated automatically controlled data stations (ACDS) and email servers on HF.
- RM-11831 ensures the ability to identify and monitor the radio transmissions of any data signal using readily available over-the-air interception methods by third parties, as required by Part 97.113(a)(4) and 97.119(a).
- Without open, over-the-air interception capability for all transmissions in the amateur radio spectrum, there is no way to determine if there is commercial, or other prohibited inappropriate content in ongoing communications over the amateur radio spectrum. FCC DA 13-1918 ¶ 6

- RM-11831 assures that the amateur radio service will not be used to bypass commercial internet or email services or be used for commercial use as required by Part 97.1, 97.3(4), 97.113(a)(5)
- Eliminating Part 97.221(c) as RM-11831 proposes would solve long standing interference issues suffered by radio amateurs wishing to use the HF RTTY/Data sub bands for other mainstream and emerging digital modes rather than ACDS purposes.

PLEASE REJECT RM-11708, RM-11759 and NPRM 16-239, as in the previous case of RM-11306.

PLEASE REJECT and DISMISS WITH PREJUDICE RM-11828, as the FCC has previously ruled on these matters before as well.

Therefore, in closing, I respectfully request that the Commission issue a Notice of Proposed Rule Making at an early date, to delete Section 97.221(c) and modify Section 97.309(a)(4) of the Commission's rules as described in RM-11831.

I also request SUMMARY DISMISSAL of RM-11708, RM-11759 and NPRM 16-239, as well as RM-11828, based on contradictions and lack of merit, as well as points raised in this RM-11831 proceeding.

Respectfully submitted,

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